



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

A717
Site: Herculaneum Lead
ID #: MOD06266373
Break: 2.0
Other: 101
SPL 2.29.02

ACTION MEMORANDUM AMENDMENT #2

SUBJECT: Project Ceiling Increase and a Change in the Scope of Work for the Removal Action at the Herculaneum Lead Smelter Site, Herculaneum, Jefferson County, Missouri

FROM: Bruce A. Morrison, Remedial Project Manager
FFSE/SUPR *BAM*

THRU: Gene Gunn, Chief *Gunn*
FFSE/SUPR

TO: Michael J. Sanderson, Director
SUPR

Site ID#: A717
Category of Removal: Time-Critical
CERCLIS ID #: MOD06266373
Nationally Significant/Precedent Setting: No

I. PURPOSE

The purpose of this Action Memorandum Amendment is to increase the removal project ceiling and to request approval for an addition to the Scope of Work for yard soil replacement and the cleaning of home interiors at the Herculaneum Lead Smelter Site. This amendment authorizes an additional \$250,000 to complete removal activities.

II. AMENDMENTS TO THE ACTION MEMORANDUM

Section V.A.1, Proposed Action Description of the Action Memorandum, is amended to read as follows:

A. Proposed Action Description

Recent site characterization activities conducted at the Site have determined the presence of high levels of lead contamination in a significant portion of the town of

40213764



SUPERFUND RECORDS



Herculaneum, Missouri. The Doe Run Resources Company, a Potentially Responsible Party is responding to the contamination with the implementation of an expedited cleanup action that consists of soil replacement and home interior cleaning.

This Action Memorandum Amendment proposes expedited soil replacement and home interior cleaning for certain categories of residents with contaminated yard soils and interior dust contamination. These residents face time-critical health risks due to potential lead exposure that was not addressed in the original Action Memorandum. Under an Administrative Order currently entered into by Doe Run and the EPA, Doe Run is conducting expedited soil removal and home interior cleaning for day-care centers and other high child-use areas, residences in Herculaneum that have children 72 months old or younger and areas of their yards contaminated with lead exceeding the 400 mg/kg site action level; and residences with lead levels in the yards exceeding 2500 mg/kg. This amendment modifies the scope of the removal action to also include the following additional categories of residences: residences where pregnant women reside; residences occupied by persons with specific lead-sensitive health conditions identified by their personal physician; and residences occupied by children older than 72 months with elevated blood lead levels at or exceeding 10 micrograms per deciliter. Evaluation and determination of the need for removal action at residences which may fall into one of these categories will be made by EPA on a case-by-case basis. In addition to expedited soil removal and interior cleanups at such residences, the residents will be offered temporary relocation on a case-by-case basis until their residences are cleaned.

B. Estimated Costs

<u>Extramural Costs:</u>	<u>Current Ceiling</u>	<u>Estimated Increase</u>	<u>Proposed Ceiling</u>
Regional Allowance Costs	\$410,000	\$250,000	\$660,000
Contingency	\$ 82,000	\$ 50,000	\$132,000
REMOVAL PROJECT CEILING	\$492,000	\$300,000 ✓	\$792,000

III. RECOMMENDATION

This decision document represents the amended removal action for specific contaminated residential properties where individuals sensitive to lead exposure have been identified at the Herculaneum Lead Smelter Site in Herculaneum, Missouri. The removal action was developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act as amended, and is not inconsistent with the National Contingency Plan. This decision is based on recent site characterization sampling results collected in the fall of 2001.

* #49,463
authority
remaining
2-22-02

PR
issued
2-22-02

*
\$4,500 - Vacu
issued
3-14-02

*
\$15,493.75
Vacuum
issued
10-15-02

Conditions at the Site meet NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the project ceiling increase and change in scope of work for this removal action. The total amended removal project ceiling is \$792,000. This amount comes from the Regional Removal Allowance

Approved:



Michael J. Sanderson, Director
Superfund Division

2/22/02
Date

Attachment